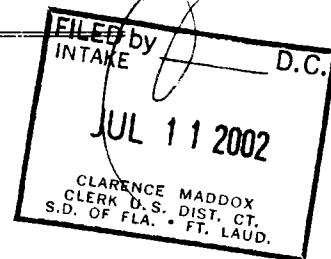


United States District Court



SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

V.

OONA BROWN, a/k/a "Amanda Jackson"

CRIMINAL COMPLAINT

CASE NUMBER:

02-4154-BSS

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to my knowledge and belief. On or about July 6, 2000, until on or about September 17, 2001 in Brow County, in the Southern District of Florida defendant(s) did, (Track Statutory Language

knowingly and willfully, CONSPIRED WITH PERSONS KNOWN AND UNKNOWN, AND WITH INTENT TO DEFRAUD CAUSED TO BE USED ONE OR MORE UNAUTHORIZED ACCESS DEVICE DURING A ONE YEAR PERIOD, AND BY SUCH CONDUCT OBTAINED THINGS OF VALUE AGGREGATING IN EXCESS OF \$1,000

in violation of Title 18 United States Code, Section(s) 1029(a)(2); (b)(2) & 2

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:
Official Title

Please see attached affidavit.

Continued on the attached and made a part hereof: ☒ YES ☐ NO

Signature of Complainant

BRIAN RUSSELL, SPECIAL AGENT
USSS

Sworn to before me, and subscribed in my presence,

JULY 11, 2002

Date

Fort Lauderdale, Florida

City and State

BARRY S. SELTZER
UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

Signature of Judicial Officer

109

AFFIDAVIT

I Brian C. Russell being sworn duly depose:

1. Your affiant is employed as a Special Agent Criminal Investigator with the United States Secret Service in Miami, Florida. Your affiant has been in my current position since June 19, 2000. Your affiant is currently assigned to investigate access device fraud which includes crimes involving stolen and unauthorized credit card numbers, identity theft, the fraudulent use of credit card numbers via the telephone and computer, and various forms of bank fraud involving credit and debit cards.

2. On or about 10/01/01, Your affiant was contacted by Ms. Christie Holley, a Fraud Investigator with American Express. Holley informed your affiant she had identified two current employees who appeared to be stealing credit card account information from the database terminals at their call center located at 777 American Express Way in Plantation, Florida. Ms. Holley advised she conducted regular checks of these database terminals used by call center employees and compared them with known fraud records to identify patterns of involvement by an employee or group of employees. ^{sch} Ms. Holley further advised that from September 17, 2000 to September 17, 2001, American Express had been defrauded of at least \$100,000.00 by Oona Brown, a/k/a Amanda Jackson, and other co-conspirators. ^{sch}

3. Ms. Holley identified two current employees, Valeria Elmore and Cassandra McKenzie, as having accessed accounts that were later taken over by fraudulent means. Elmore accessed thirty-five (35) accounts against company policy, which later resulted in \$315,280.20 in fraud. McKenzie accessed twenty-one (21) accounts against company policy that later resulted in \$140,019.79 in fraud. The total fraud amount in this scheme to date is over \$450,000.00. The method of operation in this scheme was to access American Express card member account information during the course of their jobs as customer service representatives. They would obtain the four (4) digit security codes printed on the face of valid American Express credit cards from the card members during the call. They would then enter the account to assess its value, and sell the account information to outside persons, namely Amanda Jackson a.k.a. Oona Brown, who in turn used the information to call American Express and fraudulently change the card member address and telephone information for a particular account. After the fraudulent address change, merchandise is then purchased via the telephone, computer, or catalogs using the stolen or unauthorized American Express account number and credit card expiration date.

4. On 10/25/01, SA Scott Frazier and your affiant interviewed Cassandra McKenzie at the American Express Office Complex located at 777 American Express Way in Plantation, Florida. Ms. Christie Holley was present for the interview. McKenzie was reluctant initially to provide us with any information, however, after a short period, she stated she was willing to tell us the truth. Your affiant read McKenzie her Miranda Warnings and she acknowledged them verbally and in writing. McKenzie stated she was willing to talk with us after signing the Miranda Warning waiver. McKenzie admitted she had occasionally given out American Express card member account information. She stated she was promised money every time she provided information, but claimed she never received it. McKenzie said she received the black leather Gucci purse she had in her possession in exchange for account information. As a note, Gucci was one of the stores where large amounts of telephone purchases were made fraudulently with the stolen credit card accounts. The purse was seized for evidentiary purposes. Your affiant showed McKenzie a photo line up which included Amanda Jackson's (Oona Brown) photo and asked her if she knew any of the people in the pictures. McKenzie immediately identified Amanda Jackson as someone she had given credit

card account information to in the past. Your affiant had McKenzie initial and date the photo lineup. McKenzie stated she had been involved in the fraud scheme for approximately one year. McKenzie completed a written and sworn statement stating her involvement in this scheme.

5. On May 21, 2002, Special Agent Scott Deaton and your affiant interviewed Amanda Jackson, a/k/a Oona Brown, at the Turner-Guilford-Knight (TGK) jail facility located at 7000 NW 41st Street, Miami, Florida. Jackson is currently in the custody of the United States Immigration and Naturalization Service awaiting a deportation hearing. Jackson's country of origin is Jamaica. Your affiant read Jackson her Miranda Warnings and she waived them orally but refused to sign the form. Jackson stated she did not want to talk about her involvement in this case, however, she agreed to describe the scheme and talk about other subjects who are involved. Your affiant informed Jackson she could stop the questioning at any time. Jackson stated she knew Cassandra McKenzie and Valeria Elmore were employees inside the American Express facility located at 777 American Express Way in Plantation, Florida, who were providing credit card account numbers and cardholder information to outside individuals. Jackson would not say specifically


that she received credit card account numbers and card member information from Elmore or McKenzie. Your affiant showed Jackson a copy of cellular telephone records for telephone number 954-701-8355. Your affiant received these records from Detective Richard Siciliano of the Palm Beach County Sheriff's Office. Voicestream Wireless provided the detailed call information subsequent to a subpoena issued by the State Attorney's Office in West Palm Beach, Florida. Voicestream listed the owner of 954-701-8355 as Maltide Carrozza and provided call information for the dates between 07/18/01 and 08/05/01. Detective Siciliano previously identified some of the numbers dialed from this cellular telephone as Amanda Jackson's parents' residence, American Express, Louis Vuitton, Gucci, and Neiman Marcus. Your affiant asked Jackson if she had ever been in possession of this cellular telephone. Jackson stated that was a cellular telephone given to her to use but it was not billed to her name and address. The slang term for this type of cellular telephone is a 'burner.' A 'burner' cellular telephone account is set up using stolen identity information, therefore, the user pays a one-time fee for the phone but is not billed for the airtime.

6. Further investigation into this cellular telephone account showed calls to a direct line inside the American Express facility in Plantation, Florida (954-503-0248). Ms. Christie Holley verified this extension was issued to Valeria Elmore throughout the month of July, 2001. This cellular telephone number was also listed as a contact number during the fraudulent address change of American Express customer Jamie Lasota, account (#3725-236043-91004). Another telephone number dialed from Jackson's cellular telephone was 917-541-1580. This number was listed as a contact number during the fraudulent address change of customer Deepak Kumar, (#3715-235565-01007) and customer Brian Von Deitrich, (#3715-633211-72007) accounts. Valeria Elmore accessed both of these accounts prior to the fraud taking place. Another telephone number dialed from Jackson's cellular telephone was 954-243-8022. This number was listed as a contact number during the fraudulent address change of customer Valerie Sanders, (#3728-869278-21001) and customer Danielle Schreiber, (#3729-526424-65001) accounts. Valeria Elmore accessed both of these accounts prior to the fraud taking place. Finally, the number 561-216-5915 was dialed from Jackson's cellular telephone. This number was listed as a contact number during the fraudulent address

change of customer Jamie Lasota, (#3725-236043-91004) account. Cassandra McKenzie accessed this account prior to the fraud taking place.

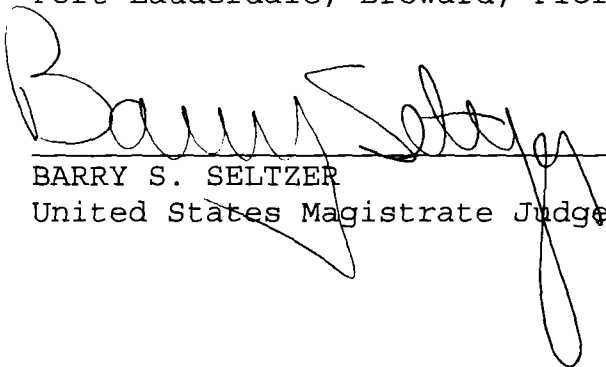
7. Based on the above information, your affiant believes Amanda Jackson, a/k/a Oona Brown, willingly and knowingly conspired with others known and unknown and with the intent to defraud caused to be used one or more access devices during a one year period obtaining goods valued in excess of \$1000.00, in violation of Title 18 USC 1029(a)(2);(b)(2) & 2. Your affiant respectfully requests an arrest warrant for Amanda Jackson, a/k/a Oona Brown.

FURTHER AFFIANT SAYETH NAUGHT



BRIAN RUSSELL
Special Agent
United States Secret Service

Subscribed and sworn to before me
This 11th day of July, 2002 at
Fort Lauderdale, Broward, Florida.



BARRY S. SELTZER
United States Magistrate Judge